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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91193732
Party	Defendant RichRelevance, Inc.
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Date	06/17/2010
Attachments	RichRelevance-Answer.pdf ( 4 pages )(2813701 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Application Serial No. 77/658850  
Published in the Official Gazette on August 18, 2009  
Word Mark: ENRICH

ENRICH SOFTWARE CORP.,

Opposer,

-against-

RICHRELEVANCE, INC.,

Applicant.

Opposition No. 91193732

**ANSWER**

Applicant RichRelevance, Inc. ("Applicant") by its attorneys Quinn Emanuel Urquhart & Sullivan LLP, answers the Notice of Opposition of Enrich Software Corp. ("Opposer") as follows:

1. Applicant denies knowledge or information sufficient to form a belief as to the allegations in Paragraph 1 of the Notice of Opposition.
2. Applicant denies knowledge or information sufficient to form a belief as to the allegations in Paragraph 2 of the Notice of Opposition.
3. Applicant admits that the records of the United States Patent and Trademark Office ("USPTO") appear to list Opposer as the owner of U.S. Trademark Registration No. 2491101 in connection with the goods listed in Paragraph 3 of the Opposition, but denies knowledge or information sufficient to form a belief as to the balance of the allegations in Paragraph 3 of the Notice of Opposition.

4. Applicant denies knowledge or information sufficient to form a belief as to the allegations in Paragraph 4 of the Notice of Opposition.

5. Applicant denies knowledge or information sufficient to form a belief as to the allegations in Paragraph 5 of the Notice of Opposition.

6. Applicant admits that it filed an application for the trademark ENRICH (the "ENRICH Application") in connection with the services listed in Paragraph 6 of the Notice of Opposition.

7. Applicant admits that it filed the ENRICH Application on January 28, 2009 as an intent-to-use application in connection with the services listed in Paragraph 6 of the Notice of Opposition, and that the ENRICH Application was assigned Serial No. 77658850. Applicant denies knowledge or information sufficient to form a belief as to balance of the allegations in Paragraph 7 of the Notice of Opposition.

8. Applicant denies the allegations in the first sentence of Paragraph 8 of the Notice of Opposition. Applicant denies knowledge or information sufficient to form a belief as to the balance of the allegations in Paragraph 8 of the Notice of Opposition.

9. Applicant admits that the word that is the subject of the ENRICH Application is identical to the stylized word in U.S. Trademark Registration No. 2491101. Applicant denies the balance of the allegations in Paragraph 9 of the Notice of Opposition.

10. Applicant denies the allegations in Paragraph 10 of the Notice of Opposition.

11. Applicant denies knowledge or information sufficient to form a belief as to the allegations in Paragraph 11 of the Notice of Opposition regarding the goodwill and value associated with U.S. Trademark Registration No. 2491101. Opposer denies the balance of the allegations in Paragraph 11 of the Notice of Opposition.

12. Applicant denies the allegations in Paragraph 12 of the Notice of Opposition.
13. Applicant denies all other allegations in the Notice of Opposition.

**AFFIRMATIVE DEFENSE**  
**(Failure to State a Claim)**

14. Opposer's claims are barred, in whole or in part, because Opposer has failed to state a claim for which relief can be granted.

All communication should be addressed to Applicant's counsel, Quinn Emanuel Urquhart & Sullivan, LLP, at the below stated address.

Dated: New York, New York  
June 17, 2010

Respectfully submitted,

Quinn Emanuel Urquhart & Sullivan, LLP

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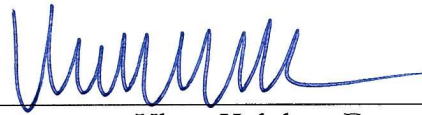
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ATTORNEYS FOR APPLICANT  
RICHRELEVANCE, INC.

**CERTIFICATE OF SERVICE**

I certify that on the 17th day of June, 2010, I caused to be served a copy of Applicant RichRelevance, Inc.'s ANSWER on Opposer Enrich Software Corp.'s counsel, Theodore D. Lienesch, Thompson Hine LLP, 2000 Courthouse Plaza NE; P.O. Box 8801, Dayton, Ohio, 45401, by first-class mail.



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Ulana Holubec, Esq.